

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LEWIS S. CLARK and PATRICIA E. CLARK,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY and  
AMMAR AL-JOUNDI,

Defendants.

No. 1:13-cv-03851-RPP

ECF Case

CLEMENT BERNARD, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY and  
AMMAR AL-JOUNDI,

Defendants.

No. 1:13-cv-04123-RPP

ECF Case

CITY OF BROCKTON RETIREMENT  
SYSTEM, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON  
W. REGENT, JAMIE C. SOKALSKY and  
AMMAR AL-JOUNDI,

Defendants.

No. 1:13-cv-05437

**NOTICE OF MOTION AND MOTION OF LEWIS S. CLARK AND  
PATRICIA E. CLARK FOR CONSOLIDATION OF RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that plaintiffs Lewis S. Clark and Patricia E. Clark (“Movants”) respectfully move this Court, under §21(D), *et seq.*, of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), for an order (a) consolidating the above-captioned actions, (b) appointing Lewis S. Clark and Patricia E. Clark as lead plaintiff, and (c) approving Movants’ selection of Glancy Binkow & Goldberg LLP as lead counsel for the putative Class.

Movants seek consolidation of related cases, appointment as lead plaintiff and approval of lead plaintiff’s choice of counsel pursuant to the Securities Exchange Act of 1934, the Federal Rules of Civil Procedure and the PSLRA. This motion is based on this Notice, the attached memorandum of law, the declaration of Gregory Linkh, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

DATED: August 5, 2013

GLANCY BINKOW & GOLDBERG LLP

By: s/ Gregory Linkh  
Gregory Linkh (GL 0477)  
Brian P. Murray (BM 9954)  
122 East 42<sup>nd</sup> Street, Suite 2920  
New York, New York 10168  
Tel: (212) 682-5340  
Fax: (212) 884-0988  
Email: glinkh@glancylaw.com

-and-

GLANCY BINKOW & GOLDBERG LLP  
Lionel Z. Glancy  
Michael Goldberg  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
Tel: (310) 201-9150  
Fax: (310) 201-9160  
Email: info@glancylaw.com

*Proposed Lead Counsel*

**PROOF OF SERVICE BY ELECTRONIC POSTING  
PURSUANT TO SOUTHERN DISTRICT OF NEW YORK  
ECF AND LOCAL RULES AND BY MAIL  
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 122 East 42<sup>nd</sup> Street, Suite 2920, New York, New York 10168.

On August 5, 2013, I caused to be served the following documents:

**NOTICE OF MOTION AND MOTION OF LEWIS S. CLARK AND  
PATRICIA E. CLARK FOR CONSOLIDATION OF RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

**MEMORANDUM OF LAW IN SUPPORT OF MOTION OF LEWIS S. CLARK AND  
PATRICIA E. CLARK FOR CONSOLIDATION OF RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

**DECLARATION OF GREGORY LINKH IN SUPPORT OF MOTION OF  
LEWIS S. CLARK AND PATRICIA E. CLARK FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

By posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the attached Court's Service List.

And by **U.S. Mail** to all known non-ECF registered parties: By placing true and correct copies thereof in individual sealed envelopes, with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 5, 2013, at New York, New York.

*s/ Gregory Linkh*  
Gregory Linkh

## Mailing Information for a Case 1:13-cv-03851-RPP

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Lionel Z. Glancy**  
lglancy@glancylaw.com,mmgoldberg@glancylaw.com,csadler@glancylaw.com,pbinkow@glancylaw.com,info@glancylaw.com,rprongay@glancylaw.com
- **Gregory Bradley Linkh**  
glinkh@glancylaw.com
- **Brian Philip Murray**  
bmurray@glancylaw.com
- **Robert Vincent Prongay**  
rprongay@glancylaw.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

**Michael Goldberg**  
Glancy Binkow & Goldberg, LLP (CA)  
1925 Century Park East, Suite 2100  
Los Angeles, CA 90067